## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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IN RE UBS AG SECURITIES LITIGATION

No. 07 CV 11225 (RJS)

## STIPULATION AND [PROPOSED] ORDER FOR THE BRIEFING SCHEDULE FOR UBS DEFENDANTS' MOTIONS TO DISMISS FOREIGN-CUBED AND FOREIGN-SQUARED CLAIMS UNDER MORRISON V. NATIONAL AUSTRALIA BANK

This stipulation is entered into between (i) Arbejdsmarkedets Tillægspension, City of Pontiac Policemen's and Firemen's Retirement System, International Fund Management S.A., and Union Asset Management Holding AG (collectively, "Lead Plaintiffs"), (ii) UBS AG, Ernesto Bertarelli, John Costas, Stephan Haeringer, Michael Hutchins, Huw Jenkins, Gabrielle Kaufmann-Kohler, Sergio Marchionne, David Martin, Rolf Meyer, Marcel Ospel, Helmut Panke, Marcel Rohner, Ramesh Singh, Peter Spuhler, Clive Standish, James Stehli, Walter Stuerzinger, Marco Suter, Peter Voser, Lawrence Weinbach, Joerg Wolle, and Peter Wuffli (collectively, "UBS Defendants"), and (iii) BNP Paribas, Credit Suisse, Deutsche Bank AG, London Branch (improperly named in the Amended Consolidated Securities Class Action Complaint (the "Amended Complaint") as Deutsche Bank AG), Goldman Sachs International, J.P. Morgan Securities Ltd., Morgan Stanley & Co. International plc., and UBS Securities LLC (collectively, "Underwriter Defendants," and with Lead Plaintiffs and UBS Defendants, the "Parties").

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned Parties to the above-captioned matter that:

- Opening Papers. UBS Defendants shall have until August 31, 2010 to serve and file a
  motion to dismiss on the basis of Morrison. UBS Defendants' memorandum of law in
  support of their motion shall not exceed thirty (30) pages.
- Opposition Papers. Lead Plaintiffs shall have until October 18, 2010 to serve and file a
  memorandum of law not to exceed thirty (30) pages in opposition to UBS Defendants'
  motion.
- Reply Papers. UBS Defendants shall have until November 10, 2010 to serve and file a
  reply memorandum of law not to exceed fifteen (15) pages in support of their motion to
  dismiss.

Dated: July 19, 2010

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Liaison Counsel for Lead Plaintiffs

So ordered on this

19 day of July 2010.

Except as otherwise stipulated in this Order, the parties' motion papers shall adhere to the Court's Individual Practices, Rule 2.

Honorable Richard J. Sullivan United States District Court Judge